

## **EXHIBIT 28**

**In the Matter Of:**

*In Re: Google Antitrust Litigation*

---

[REDACTED]

*August 10, 2021*

---



Highly Confidential [REDACTED] - August 10, 2021

169

1 product proposal and vision, but the core technical  
2 design was written by [REDACTED] with input from several  
3 folks.

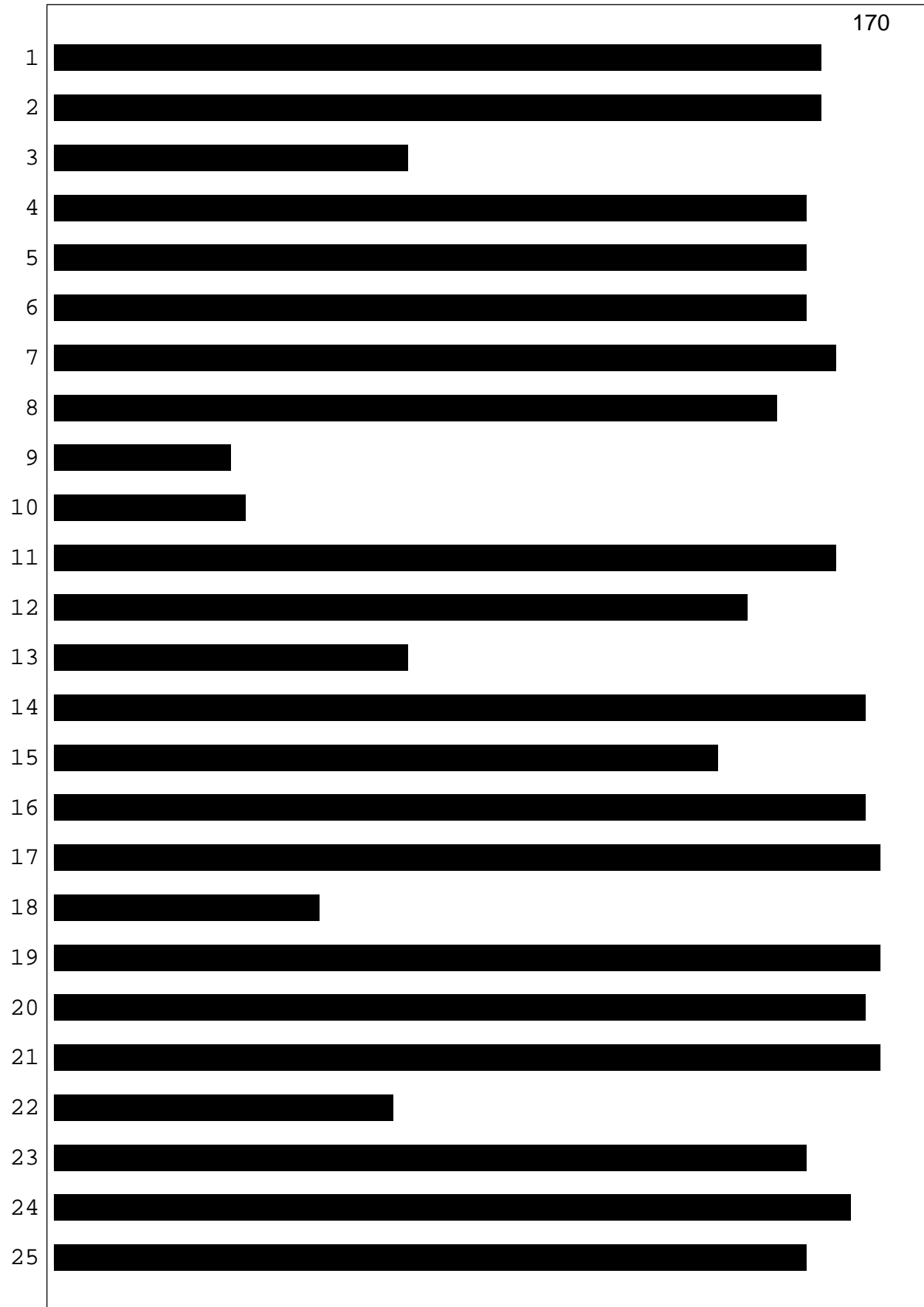
4 Q. And when [REDACTED] or [REDACTED] made the core  
5 technical design, was [REDACTED] working off of the original  
6 design that you had put together?

7 A. I'm not sure. I think that -- as I mentioned  
8 earlier, part of our work process involves proposing an  
9 idea and getting feedback and iterating on it and  
10 refining it.

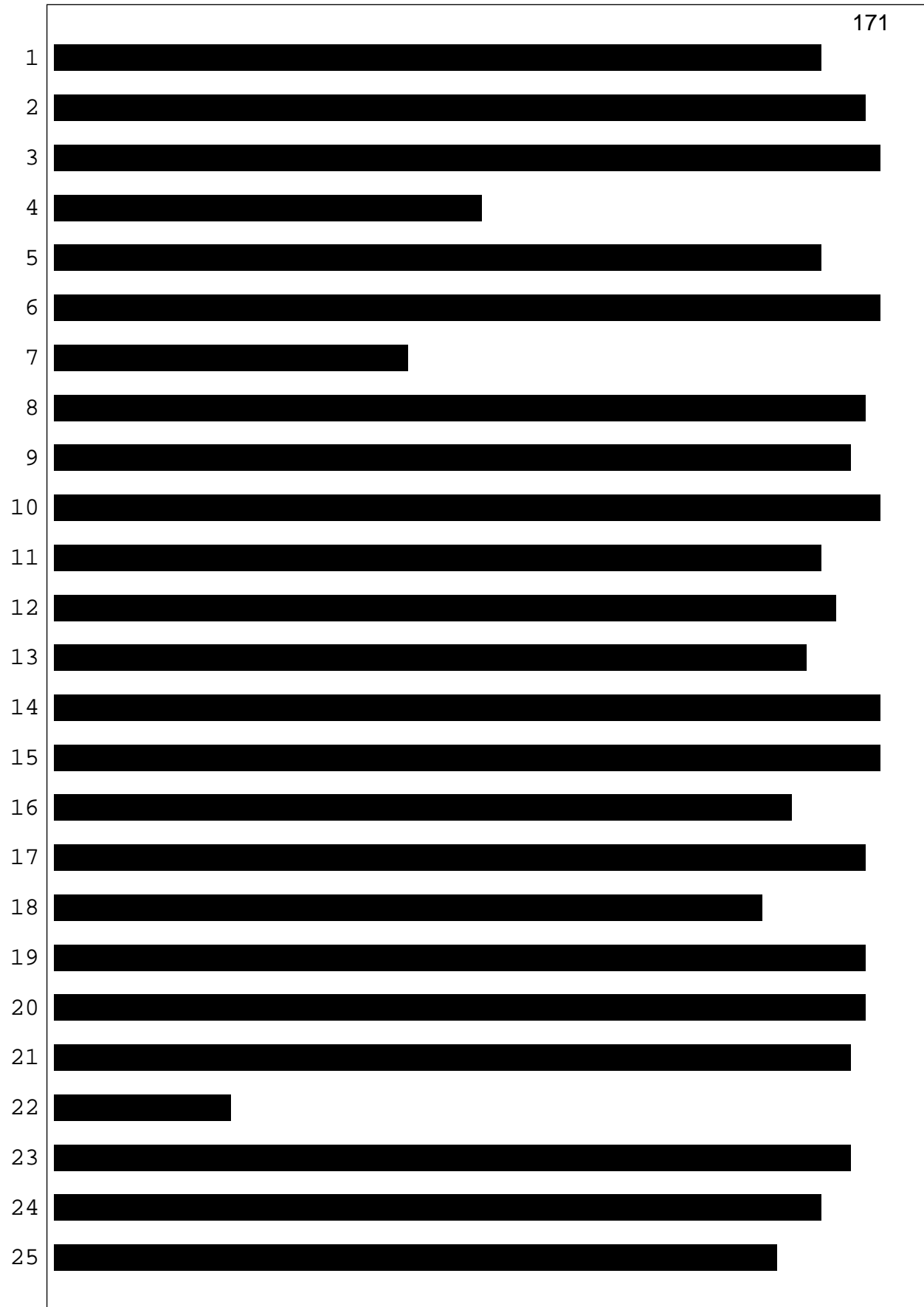
11 So I wouldn't be surprised if some of his  
12 design might have come from earlier versions of a  
13 proposal. My proposal was certainly informed by earlier  
14 versions of this and other proposals.

15 Q. [REDACTED]  
16 [REDACTED]  
17 [REDACTED]  
18 [REDACTED]  
19 [REDACTED]  
20 [REDACTED]  
21 [REDACTED]  
22 [REDACTED]  
23 [REDACTED]  
24 [REDACTED]  
25 [REDACTED]

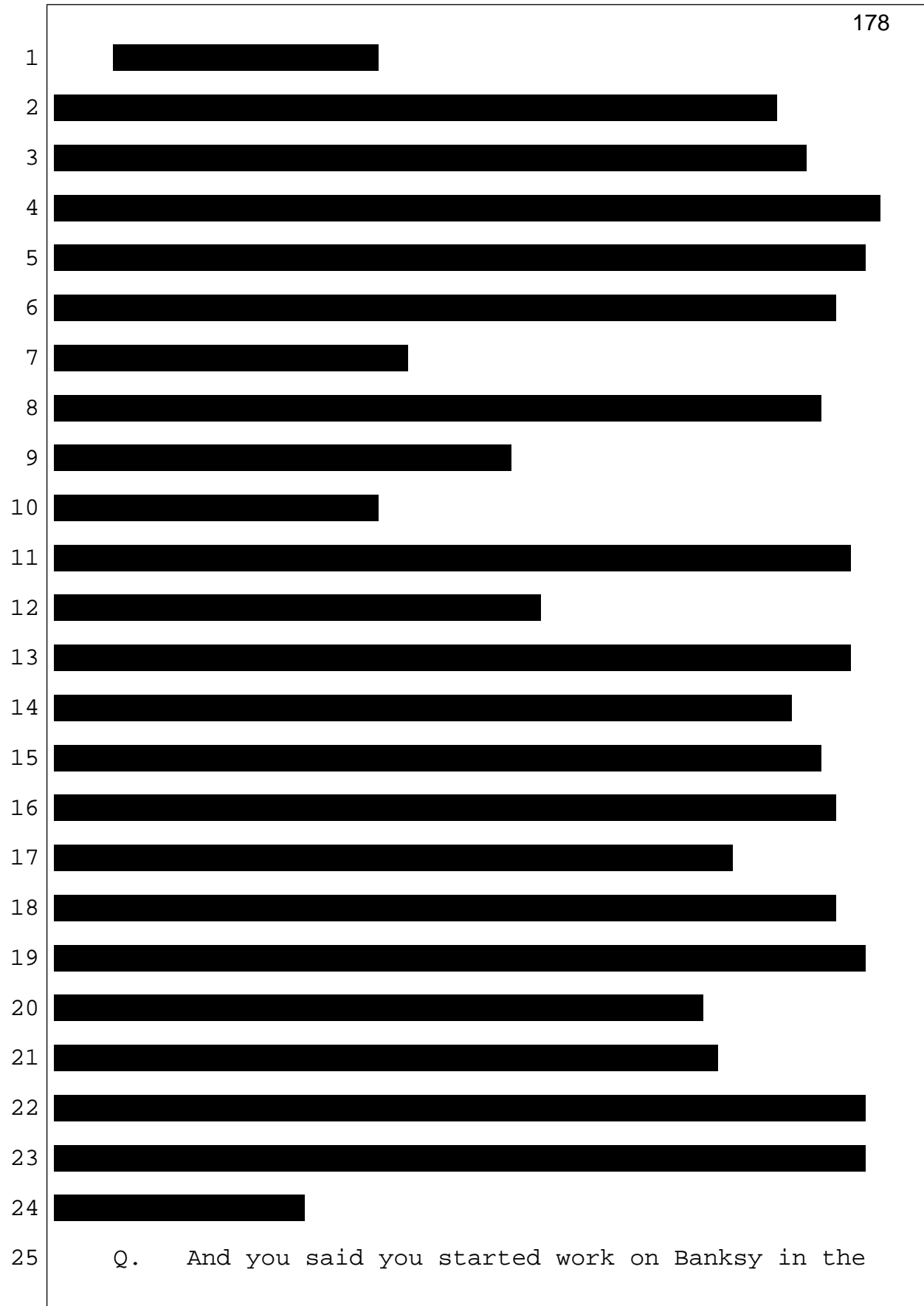
Highly Confidential [REDACTED] - August 10, 2021



Highly Confidential [REDACTED] - August 10, 2021



Highly Confidential [REDACTED] - August 10, 2021



Highly Confidential [REDACTED] - August 10, 2021

179

1 first half of 2020?

2 A. Well, as I mentioned, some of these ideas have  
3 been around for years; and we've been iterating on them  
4 for a number of years. So I guess it's hard to say when  
5 some of these ideas first emerged. But we regularly go  
6 through numerous proposals and iterations before we  
7 decide to build something that's new and complex.

8 But the current effort began in the spring  
9 of 2020, yes.

10 Q. And who approved starting work on Banksy?

11 MS. ELMER: Same objection that I gave  
12 earlier or instruction that I gave earlier, [REDACTED]

13 A. Yeah. I think -- I'm not sure I can answer  
14 that question without revealing privileged information.

15 MS. ELMER: Then don't.

16 Q. (By Mr. Geiger) So you won't answer the  
17 question?

18 A. I don't think I can answer that without  
19 revealing privileged information.

20 Q. Who was the attorney with whom you spoke?

21 MS. ELMER: The identity of the attorney  
22 you can reveal.

23 A. [REDACTED]. There are a large number of  
24 attorneys involved with whom I spoke on the issue that  
25 would be privileged.

Highly Confidential [REDACTED] - August 10, 2021

180

1 Q. (By Mr. Geiger) When did you speak with -- you  
2 said [REDACTED]?

3 A. Yeah. There were several others as well.  
4 [REDACTED]. There's a large number of  
5 lawyers.

6 Q. And when did you speak to them about this  
7 topic?

8 A. Throughout 2020 and 2021.

9 Q. Why did Google start working on Banksy?

10 MS. ELMER: Same instruction.

11 A. Yeah. I don't think I can answer that question  
12 without revealing legally privileged information.

13 Q. (By Mr. Geiger) You won't answer the question?

14 A. I don't think I can answer it without revealing  
15 legally privileged information.

16 Q. Is Banksy available to any publishers today?

17 A. As I mentioned previously, it's not live yet.

18 Q. Is it in beta?

19 A. It hasn't launched yet. We are working on  
20 launching a pilot. We are hoping to have a pilot launch  
21 soon, but I don't believe anything is live yet.

22 Q. [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]